Revised 09/04

DUE DATE

DIST

DEGENHART, K. R.

FERRERA, D. W.

GIACOMINI, J. J LINDSAY, D. C.

MARTINEZ, L. A. NAGEL, R. E.

BERARDINI, J.H.

BOGNAR, E.S.

BROOKS, L. **BUTLER, L** CARPENTER M

CIUCCI JA CROCKETT, G. A DECK, C. A

DIETER, T. J

LONG, J. W. LYLE, J. L

NESTA, S.

NORTH, K SHELTON, D. C.

SPEARS, M. S PIZZUTO, V. M

TUOR, N. R.

WEMELT, K. WILLIAMS, J. L

Gilbrestr

ZAHM, C.

ACTION

CORRES. CONTROL INCOMING LTR NO.

X

Ž

RECEIVED

STATE OF 2004 SEP 27 A 11: 32

00428 RF04 BILL Owens, Governor CURRESPONDENCE

Douglas H. Benevento, Executive Okterton

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. 5. Denver, Colorado 80246-1530 Phone (303) 692-2000

Laboratory and Radiation Services Division 8100 Lowry Blvd.

LTR ENC TDD Line (303) 691-7700 (303) 692-3090

Denver, Colorado 80230-6928

Located in Glendale, Colorado

Colorado Department of Public Health and Environment

http://www.cdphe.state.co.us

Mr. Joe Legare

September 21, 2004

Director, Project Management Division

U.S. Department of Energy, Rocky Flats Project Office

10808 Highway 93, Unit A Golden, CO 80403-8200

RE: Pre-Demolition Survey Reports (PDSRs) for Building 771 Area AF & AH East - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSRs for Building 771 Area AF (Revision 0 dated September 13, 2004), and Area AH East (Revision 0, dated September 13, 2004). Your letter regarding these PDSRs was received by fax on September 21, 2004. Although these PDSRs are not the usual PDSRs provided for our approval (with contaminated and free-release areas interspersed), based on the information contained in these PDSRs, our understanding of the special circumstances related to the decontamination efforts associated with B771, the ultimate removal of the remaining contamination that exists within Areas AF & AH East and allowing recycling of as much of the concrete that meets the free-release criteria as possible, as well as inherent difficulties with performing these PDSs to appropriate PDSP requirements, we are hereby approving the PDSRs for Building 771 Areas AF & AH East.

These PDSRs identify areas of B771 Area AF & AH East that meet the unrestricted release criteria allowing the concrete to be recycled in those areas. However, as stated in these PDSRs for Areas AF & AH East (as well as Areas AE & AH West), contamination remains in B771 within 6 feet of final grade that must and will be removed. We expect that, as stated, all of the remaining contamination within 6 feet of final grade will be properly identified, protected, segregated, controlled, and removed, and none will be left or incorporated into the recycled concrete (free-releasable) rubble that will be left on site. The actions performed and data generated necessary to achieve and document this complete contamination removal must be properly described and provided in the Closeout Report.

The remaining contaminated portions of B771 that are below 6 feet of final grade, which will not be removed, must also be properly identified and described in the Closeout Report, to include maps or figures showing the extent of remaining infrastructure (slab, walls, floors, etc), as well as nature, levels, and extent of remaining contamination.

We have identified several minor issues with some of the figures provided that should be modified. We have also identified concerns/inconsistencies with the final grade lines below 6 feet. The survey unit boundaries and the 6foot line are not consistent for the 1st floor ceiling, 2nd floor, or actual proposed demolition removal line. However, as discussed and agreed with Chris Gilbreath, with KH, removal of areas not included in the surveyed areas will be removed as contaminated material and those areas that were in surveyed units but not removed will be recognized and properly addressed in the Closeout Report. It is expected that most of the areas of concern will

COR. CONTROL ADMIN, RECORD PATS/130

> Reviewed for Addresses Corres. Control REP

Ref. Ltr. #

DOE ORDER # 5400

ADMIN RECORD

be removed. The Closeout Report will properly show the actual line of removal, and properly address the remaining structure and levels of contamination.

All demolition activities and related issues are expected to be discussed and resolved utilizing the consultative process.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, Denise Onyskiw at (303) 692-3371 or (303) 966-6687, or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson RFCA Project Coordinator

Warren Seyfert, DOE

Dave Shelton, KH Steve Nesta, KH Bruce Wallen, DOE Chris Gilbreath, KH Mark Aguilar, EPA Sam Garcia, EPA

Administrative Records Building T130G

